

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RANDOLPH W. KEUCH	:	
Plaintiff,	:	CIVIL ACTION
v.	:	
TEVA PHARMACEUTICALS USA, INC.,	:	CASE NO. 2:19-CV-05488 (JMG)
And TEVA PHARMACEUTICAL	:	
INDUSTRIES, Ltd.,	:	
Defendants.	:	

PLAINTIFF'S RESPONSE TO DEFENDANTS'
OMNIBUS MOTION IN LIMINE TO EXCLUDE CERTAIN EVIDENCE AT TRIAL

For the reasons fully set forth in the accompanying Memorandum, Plaintiff, Randolph W. Keuch ("Keuch" or "Plaintiff") responds to the Omnibus Motion *In Limine* to Exclude Certain Evidence at Trial and respectfully suggests that the broad preclusions relating to the evidence sought by the Defendants, Teva Pharmaceuticals USA, Inc. and Teva Pharmaceutical Industries, Ltd. either be rejected by this Honorable Court before trial or await review and disposition of the issues raised based upon the circumstances presented at trial.¹

Respectfully submitted,

SPECTOR GADON ROSEN VINCI P.C.

By: /s/ Alan Epstein

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Dated: November 4, 2022

¹ As related fully in the accompanying Memorandum, Plaintiff and his counsel agree that issues that are left for disposition at trial will only be raised in accordance with the limited circumstances raised by Plaintiff herein and the nature Court's disposition of those issues and will not be raised in the opening statements made by Plaintiff's Counsel.